

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

13-1261

Name and address of Plaintiff:

~~LUNN, THOMASON #160636 11 HARDWOOD RD~~  
~~501 CAMBRIDGE SPRINGS~~ PCH, PA. 15235  
~~121 FORTERSON AVENUE CAMBRIDGE SPRINGS, PA.~~  
 16403-1338

v.

Full name, title, and business address  
of each defendant in this action:

1. ~~PANDAL B. TODD (INDIVIDUALLY)~~  
~~60 COURT OF COMMON PLEAS~~  
~~CRIMINAL DIVISION, GRANT STREET, PCH, PA.~~ 15219  
 2. ~~COURT ADMINISTRATION~~  
~~60 COURT OF COMMON PLEAS~~  
~~FRICK BUILDING - GRANT STREET, PCH, PA.~~ 15219

Use additional sheets, if necessary  
Number each defendant.

Plaintiff brings this action against the above named and identified defendants on the following cause of action:

- I. Where are you now confined? SCOT-CAMBRIDGE SPRINGS  
 What sentence are you serving? FINISHED SENTENCE - 4 YEARS  
 What court imposed the sentence? COURT OF COMMON PLEAS  
ALLEGHENY COUNTY
- II. Previous Lawsuits

- A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs

N/A

Defendants

N/A

2. Court (if federal court, name the district; if state court, name the county) and docket number

N/A

RECEIVED

AUG 30 2013

CLERK, U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

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(3) President Judge (Individually)  
% Court of Common Pleas  
Criminal Division  
Grant Street  
Pittsburgh, PA. 15219

(4) John Pittman (Individually)  
% District Attorney's Office  
Court of Common Pleas  
Criminal Division  
Grant Street  
Pittsburgh, PA. 15219

(5) Steven Zapala, Jr. (Individually)  
% District Attorney  
Court of Common Pleas  
Grant Street  
Pittsburgh, PA. 15219

(6) Todd F. Hollis (Individually)  
428 Forbes Avenue  
Suite - 505  
Pittsburgh, PA. 15219

3. Name of judge to whom case was assigned

MAGISTRATE JUDGE,

4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)

WRIT OF HABEAS CORPUS WAS

GRANTED - NOTHING HAPPENED

5. Approximate date of filing lawsuit

WAS A WRIT OF HABEAS

6. Approximate date of disposition

NOTHING HAPPENED

B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where?

When?

Result:

N/A

III. What federal law do you claim was violated?

42 U.S.C. SECTION 1983;  
1985; 1987; PLAINTIFF'S CLAIMS FOR  
INJUNCTIVE RELIEF; 28 U.S.C. SECTION 2283  
2284

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

A. Date of event:

2012; 2013

B. Place of event:

ALLEGHENY COUNTY

C. Persons involved--name each person and tell what that person did to you:

BRANDAL TODD - SENTENCED  
LYNNE THOMPSON IN THE COURT  
OF COMMONWEALTH OF PA  
KNOWING THAT LYNNE WAS NOT  
REPRESENTED BY COUNSEL TO STEAL  
MONIES TODD THOMAS SIGNED TO  
ENTER IN APPEARANCE WHEN COLES  
HAD NOT WITHDRAWN, BRANDAL TODD  
WAS AWARE BY LETTER AND PHONE  
CALLS LYNNE DID NOT WANT TO BE  
REPRESENTED BY TODD THOMAS.

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- (2) RANDAL TODD ISSUED WRONG PAPERWORK TO KEEP LYNNE REMAIN IN PRISON AND NOT CORRECTING PAPERWORK FOR PEOPLE CREDITED A PORTION OF TIME, USING HIS POWER FOR ABUSE HIS AUTHORITY, WITH MALICIOUS ABUSE OF PROCESS.
- (3) RANDAL TODD LIED IN THE PETITION FOR P.C.R.B. STATING THAT DURING SENTENCING HE DID NOT RELY ON THE P.S.I., DURING HIM SENTENCING LYNNE HOWEVER HE DID USE THE P.S.I. (Along with the Attorney Hollis, Just stood there with not even going over records on the P.S.I.; Hollis with Hollis was not the Attorney of Record creating ABUSE OF POWER; Rights of EQUAL PROTECTION A Right to Be Represented by Counsel.
- (4) A Post Sentence Motion was filed with having a hearing date, 4-13-12, JUDGE TODD NEVER HAD THIS HEARING DENYING RIGHTS OF DUE PROCESS.
- (5) Motions were filed, PRO-SE, JUDGE TODD, NEVER ANSWERED ANY MOTIONS)

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WHERE HE WAS REMOVED FROM THE BENCH FOR HAVING CRIMINAL CHARGES; HIS CASES SHOULD HAVE BEEN RE-ASSIGNED; BUT NOTHING HAPPENED AND ONCE AGAIN RIGHT TO A FAIR TRIAL; MISBARKING OF JUSTICE OCCURRED.

(6) RIGHTS WERE DENIED TO WITHDRAW A PLEA ACCORDING TO RULES OF CRIMINAL PROCEDURE - 39(f), ALSO RULE OF CRIMINAL PROCEDURE RULE - 120.6(b).

(7) BIAS AND PREJUDICES FOR AFTER FILING A MOTION TO COMPEL; TORE NOTHING WAS BEING DONE ON THE MOTIONS FILED WITH BIAS; MALICE; VINDICTIVENESS, JUDGE LADD ISSUED AN ORDER OF JULY 9, 2012 TO HAVE LYNNE SENT TO SCI-MUNCY, AFTER SPENDING THIRTEEN MONTHS IN Allegany County Jail.

(8) CONSPIRING AND CONSPIRACY WITH LETTERS FROM LADD HOLLIS WHERE HE WAS GOING TO WITHDRAW FROM A CASE THAT HE WAS NEVER APPOINTED TO OR HAD AN APPEARANCE ON FOR WHEN HE SUPPOSEDLY FILE AN APPEARANCE,



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ON 9-28-12; THE ATTORNEY OF RECORD, LOU COLES WHO WAS APPOINTED BY TODD HAD NOT BEEN GRANTED TO WITHDRAW; SO THEREFORE HOLLIS COMMITTED THEFT, ALONG WITH HEND, TO GET MONIES OF FOUR THOUSAND DOLLARS  
 (9) CONSPIRACY WITH TODD HOLLIS AND RANDAL TODD WITHOUT REGARDS TO PROPER PROCEDURES OF DUTY OF AN ATTORNEY ACCORDING TO RULE-120 (A)(B).

(10) RANDAL TODD WAS ASKED TO RECUSE HIMSELF SINCE IMPARTIALITY HAD OCCURRED ACCORDING TO RULE-700.

(11) RANDAL TODD WAS FOUND GUILTY OF DWI AND DESTRUCTION OF PROPERTY AND WAS TAKEN OFF THE BENCH; NOTHING WAS DONE WITH THE INJUSTICES THAT WERE CREATED EXCEPT LYNNE HENDERSON WAS UNLAWFULLY HELD IN PRISON.

(12) A WRIT OF HABEAS CORPUS WAS FILED AND GRANTED; THIS WAS SWEPT UNDER THE RUG WHERE IT SABOTAGED.

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(13) JOHN PITTMAN WENT OUTSIDE THE GUIDELINES TO OBTAIN A CONVICTION, WHERE HE WENT OUTSIDE COUNTY NOT WITHIN HIS DISTRICT FILING CHARGES NOT WITHIN HIS JURISDICTION CAUSING PROSECUTORIAL MISCONDUCT IN ORDER TO GET A CONVICTION.

(14) AN APPEAL WAS FILED AND DOCKETED IN SUPERIOR COURT AS TO WHERE LOWER COURT OF COMMON PLEAS WAS TO TRANSMIT THE RECORD THIS NEVER HAPPENED; THEN ALMOST SOME THREE MONTHS LATER RANDAL TODD FILED FOR A CONCISE STATEMENT WHICH WAS OUT OF TIME, THIS CASE SHOULD HAVE BEEN DISMISSED OR VACATED; BUT NOTHING WAS DONE ACCORDING TO PROCEDURE THIS IN ITSELF WAS A VIOLATION OF CONSTITUTIONAL RIGHTS ALONG WITH RIGHTS TO FAIR HEARING; DUE PROCESS OF LAW.

(CONT ON SEPARATE SHEET(S))

- V. Did the incident of which you complain occur in an institution or place of custody in this District?  
If so, where?

N/A

and answer the following questions:

- A. Is there a prisoner grievance procedure in this institution?  
Yes ( ) No ( )

- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?  
Yes ( ) No ( )

- C. If your answer is YES,

1. What steps did you take? \_\_\_\_\_  
2. What was the result? \_\_\_\_\_

- D. If your answer is NO, explain why not:

THIS CIVIL RIGHTS ACTION  
IS DUE TO VIOLATIONS OF WRIT OF HABEAS CORPUS.

- E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?  
Yes ( ) No ( )

- F. If your answer is YES,

1. What steps did you take? \_\_\_\_\_ N/A  
2. What was the result? \_\_\_\_\_

VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

(1) VACATE THIS ILLEGAL SENTENCE; Forthwith.  
(2) DAMAGES AWARDED (CONT. ON SEPARATE SHEET OF PAPER)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.



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DAMAGES

- (3) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS "IN EXCESS OF" THREE HUNDRED THOUSAND DOLLARS.
- (4) NEGLIGENCE - "IN EXCESS OF" THREE HUNDRED THOUSAND DOLLARS.
- (5) DUE PROCESS - "IN EXCESS OF" FOUR HUNDRED THOUSAND DOLLARS.
- (6) OFFICIAL MISCONDUCT - "IN EXCESS OF TWO HUNDRED THOUSAND DOLLARS.
- (7) COLORE OF LAW: 1983 - "IN EXCESS OF" FIVE HUNDRED THOUSAND DOLLARS.
- (8) FALSE IMPRISONMENT - "IN EXCESS OF FIVE HUNDRED THOUSAND DOLLARS.
- (9) PUNITIVE DAMAGES - "IN EXCESS OF" FOUR HUNDRED THOUSAND DOLLARS.

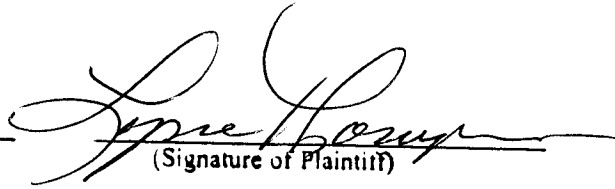
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(10.) RETALIATION - "IN EXCESS OF"  
THREE HUNDRED THOUSAND DOLLARS.

(11.) PAIN AND SUFFERING: "IN EXCESS  
OF THREE HUNDRED THOUSAND  
DOLLARS

DEMAND TRIAL BY JURY, AND  
FOR WHAT EVER THIS COURT DEEMS  
JUST.

8-29-13  
(Date)

  
(Signature of Plaintiff)